

#### PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298 **FILED**02/09/23
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A1912008

February 9, 2023

Agenda ID #21334 Ratesetting

#### TO PARTIES OF RECORD IN APPLICATION 19-12-008:

This is the proposed decision of Administrative Law Judge Ehren Seybert. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's March 16, 2023 Business Meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.

Parties to the proceeding may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure. Electronic copies of comments should also be sent to the Intervenor Compensation Program at <a href="mailto:icompcoordinator@cpuc.ca.gov">icompcoordinator@cpuc.ca.gov</a>.

/s/ MICHELLE COOKE

Michelle Cooke
Acting Chief Administrative Law Judge

MLC:nd3 Attachment

# Decision PROPOSED DECISION OF ALJ SEYBERT (Mailed 2/9/2023)

#### BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Edison Company (U338E) for Approval of its 2019 Rate Design Window Proposals.

Application 19-12-008

### DECISION GRANTING COMPENSATION TO SMALL BUSINESS UTILITY ADVOCATES FOR SUBSTANTIAL CONTRIBUTION TO DECISION 20-12-032

Intervenor: Small Business Utility Advocates (SBUA)	For contribution to Decision (D.) 20-12-032
Claimed: \$12,841.50	<b>Awarded:</b> \$5,699.58
Assigned Commissioner: Genevieve Shiroma	Assigned ALJ: Ehren Seybert

#### PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	D.20-12-032 holds that Southern California Edison Company (SCE) complied with the Commission's requirements in Decision 18-11-027 to submit a study on the applicability of all-electric baseline quantities to residential customers with Heat Pump Water Heaters (HPWH), and that SCE's HPWH study is reasonable.
	The HPWH issue was the only remaining issue in the Rate Design Application submitted by SCE on December 16, 2019.

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# B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verification						
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):								
1. Date of Prehearing Conference:	February 20, 2020	Verified						
2. Other specified date for NOI:								
3. Date NOI filed:	March 17, 2020	Verified						
4. Was the NOI timely filed?		Yes						
Showing of eligible custo or eligible local government enti	(0 ( //							
5. Based on ALJ ruling issued in proceeding number:	A.18-11-005	Verified						
6. Date of ALJ ruling:	June 24, 2019	Verified						
7. Based on another CPUC determination (specify):								
8. Has the Intervenor demonstrated customer stagovernment entity status?	atus or eligible	Yes						
Showing of "significant financial han	rdship" (§ 1802(h) or §	1803.1(b)):						
9. Based on ALJ ruling issued in proceeding number:	R.20-08-020	Verified						
10. Date of ALJ ruling:	December 23, 2020	Verified						
11. Based on another CPUC determination (specify):								
12. Has the Intervenor demonstrated significant f	inancial hardship?	Yes						
Timely request for compensation (§ 1804(c)):								
13. Identify Final Decision:	D.20-12-032	Verified						
14. Date of issuance of Final Order or Decision:	December 21, 2020	Verified						
15. File date of compensation request:	February 18, 2021	Verified						
16. Was the request for compensation timely?		Yes						

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<sup>&</sup>lt;sup>1</sup> All statutory references are to California Public Utilities Code unless indicated otherwise.

# PART II: SUBSTANTIAL CONTRIBUTION

# A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059):

Intervenor's Specific References to Claimed Contribution(s) Claimed Contrib	
1. Initial Involvement. SBUA filed a Response to the overall Application and participated in the Pre-hearing Conference. SCE's original Rate Design Application focused on three issues: energy storage study, residential electrical essential usage study and HPWH study. SBUA filed a Response on the three issues, however, both the energy storage study and the residential essential usage study were removed from this proceeding for consideration.  SBUA participated in this proceeding to ensure small commercial customer needs are represented, including with the implementation of D.18-11-027, which approved SCE's 2018 General Rate Case (GRC) Phase 2 Residential and Small Commercial Rate Design Settlement Agreement in A.17-06-030. SBUA was a party to that settlement agreement, and our advocacy here is part of a broader campaign to advocate for small commercial customers with regard to rate design and other issues in Phase 2 GRCs.  "Responses to the Appli timely filed by Smal Utility Advocates (SBU SCE filed a reply to pro responses on January 27. Decision, p.2  The Commission held a conference on February discussed whether the Estudy Plan should be convicted in this proceeding to ensure small commercial customer needs are represented, including with the implementation of D.18-11-027, which approved SCE's 2018 General Rate Case (GRC) Phase 2 Residential and Small Commercial Rate Design Settlement Agreement in A.17-06-030. SBUA was a party to that settlement agreement, and our advocacy here is part of a broader campaign to advocate for small commercial customers with regard to rate design and other issues in Phase 2 GRCs.	Business A), and). tests and 7, 2020.  prehearing 20, 2020 to e scope of the ral matters. es also assential Use msolidated tate Case ting ne study plan dered."  assigned ALJ SEIA's deration of the om the ng SCE to of its GRC recision, p. 3.  rements in iated to submit a ty of antities to oth HPWHs." F Law #1, p. 8.  ress Utility  comments.  See discussion in Part III.D., below.

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
	Southern California Edison Company's (U 338E) for Approval of its 2019 Rate Design Window, dated January 16, 2020.	
2. Early Resolution. SBUA supported SCE's motion for the proceeding to be submitted for decision.	"On July 23, 2020, SCE filed a motion for the proceeding to be submitted for decision, and for the admission of evidence into the record. No party filed opposition to SCE's motion. SCE's motion was granted by the assigned ALJ via email ruling on October 26, 2020." Decision, p. 3.	Verified but with comments.  See discussion in Part III.D., below.  [1]

# B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

		Intervenor's Assertion	CPUC Discussion	
a.	Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding? <sup>2</sup>	Yes	Verified	
b.	Were there other parties to the proceeding with positions similar to yours?	Yes	Verified	
c. If so, provide name of other parties: All parties supported only proceeding to Decision on the HPWH issue of the Application.				
d.	<b>d. Intervenor's claim of non-duplication:</b> SBUA participated on behalf of small businesses. No other parties were representing exclusively the interests of small business customers as a class. SBUA presented its Response to the Application and then limited its advocacy to the one remaining issue and supporting the quick resolution of the proceeding.			

<sup>&</sup>lt;sup>2</sup> The Office of Ratepayer Advocates was renamed the Public Advocate's Office of the Public Utilities Commission pursuant to Senate Bill 854, which the Governor approved on June 27, 2018.

# PART III: REASONABLENESS OF REQUESTED COMPENSATION

# A. General Claim of Reasonableness (§ 1801 and § 1806):

	<b>CPUC Discussion</b>
a. Intervenor's claim of cost reasonableness:  SBUA actively participated in the proceeding, but limited its hours to the initial review and analysis of the Application, expert work to develop SBUA's positions, drafting a Response to the Application, and the subsequent quick resolution of the remaining HPWH issue.  Rate design has important impacts on small commercial customers, and it was reasonable for SBUA to have participated on behalf of this ratepayer class. The Commission should conclude that SBUA's involvement and costs were reasonable to protect and advance the rate design interests of these customers.	See discussion in Part III.D., below.
b. Reasonableness of hours claimed:  SBUA seeks recovery for 26.4 hours of attorney and expert time, excluding hours associated with the compensation billing hours. SBUA prepared and developed its litigation strategy but then supported an early resolution of issues, including moving consideration of the Essential Use Study to PG&E's GRC, Phase II (A.19-11-019). SBUA is now focusing its rate design advocacy on that docket and SCE's GRC, Phase II (A.20-10-012).	See discussion in Part III.D., below.
SBUA Litigation Supervisor, Jennifer Weberski, coordinated SBUA's engagement during the proceeding. Ms. Weberski has 24 years of utility regulatory experience. Based on SBUA's participation in related rate design proceedings and decades of pertinent legal experience, Ms. Weberski efficiently participated in this docket and spent a reasonable amount of time leading to an early resolution.	
SBUA's experts Paul Chernick and John Wilson served as SBUA's consultants and utility experts. Mr. Chernick has over 40 years of experience in the utility field and is the founder and President of Resource Insights, a nationally recognized consulting firm that specializes in the regulation of electric and gas utilities. Mr. Wilson has over 28 years of experience with regard to utility regulation. See, Comment # 3 below for greater detail regarding our request for Mr. Wilson. Mr. Chernick and Mr. Wilson assisted in analyzing the	

	<b>CPUC Discussion</b>
Application and developing SBUA positions; however, due to an early resolution of issues, no expert testimony was required.	
SBUA submits that all of the recorded hours claimed were reasonably and efficiently expended and appropriate in the context of the level of effort required to participate in the early stages of a complex rate design window proceeding. Therefore, SBUA seeks compensation for all of the hours recorded by our attorneys and experts and included in this request.	
c. Allocation of hours by issue:  SBUA's hours are limited to the Procedural issues, energy storage study issue and HPWH issue.	See discussion in Part III.D., below.

# B. Specific Claim:

	CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE I						FEES			
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$	
Jennifer Weberski	2019	10.9	\$460.00	2018 rate from D.18-10-047 escalated by a 5% step increase plus 2.35% COLA per ALJ-357; see comment #1	\$5,014.00	4.13 [2]	\$460.00 [3]	\$1,899.80	
Jennifer Weberski	2020	9	\$470.00	As above, escalated by a 2.55% COLA in Res. ALJ-387	\$4,230.00	3.41 [4]	\$470.00 [5]	\$1,602.70	
Paul Chernick	2019	1.5	\$400.00	D.20-06-015	\$600.00	0.57 [6]	\$400.00	\$228.00	
Paul Chernick	2020	2	\$430.00	As above, increased by a 5% step increase and escalated by a 2.55% COLA in Res. ALJ-387; see comment #2	\$860.00	0.76 [7]	\$430.00 [8]	\$326.80	

			CLAIM	ED			CPUC AWA	ARD
John Wilson	2020	3	\$360.00	Res. ALJ-387, see comment # 3	\$1,080.00	1.14	\$360.00 [10]	\$410.40
WIISOII					¢11.704.00	[9]		¢ 4 467 70
				Subtotal:	\$11,784.00		Subtotal	: \$4,467.70
		INTERV	ENOR CO	OMPENSATION CLA	AIM PREPA	RATION	J**	
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Jennifer Weberski	2020	2.25	\$235.00	50% of 2020 Rate	\$528.75	2.25	\$235.00 [11]	\$528.75
Jennifer Weberski	2021	2.25	\$235.00	50% of 2020 Rate; see comment #4	\$528.75	2.25	\$312.50 [12]	\$703.13
	Subtotal: \$1,057.50				l: \$1,057.50		Subtotal	: \$1,231.88
	TOTAL REQUEST: \$12,841.50			\$12,841.50	TOTA	L AWARD	: \$5,699.58	

<sup>\*</sup>We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§ 1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

# C. Attachments Documenting Specific Claim and Comments on Part III:

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Timesheet of Jennifer Weberski
Attachment 3	Timesheet of Resource Insight, Inc.
Attachment 4	Resume / Qualifications of John D. Wilson
Comment 1	Hourly Rate for Attorney Jennifer L. Weberski: Ms. Weberski's rate in D.18-10-047 was set at \$425 per hour for 2018.  The increase in Ms. Weberski's 2019 rate is due to the Commission approved COLA of 2.35 percent adopted by Resolution ALJ-357. In addition, we are asking for a 5% step increase for Ms. Weberski, resulting in

<sup>\*\*</sup>Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate

Attachment or Comment #	Description/Comment
	a 2019 rate of \$460 per hour (425*1.0235*1.05, rounded to the nearest five, per D.13-05-009).
	Resolution ALJ-357, which approved the 2019 COLA, states: "It is reasonable to allow individuals an annual 'step increase' of 5%, twice within each experience level and capped at the maximum rate for that level, as authorized by D.07-01-009." Ms. Weberski, who has over 20 years of legal experience and deep expertise advocating before the Commission, is in the 13+ years of experience bracket has not yet received a step increase in this experience level. Her requested rate with this step increase is well below the rate cap of \$600 per hour for attorneys with this bracket of experience.
Comment 2	2020 Hourly Rate for Expert Paul L. Chernick: Mr. Chernick's rate in D.20-06-015 was set at \$400 per hour in 2019. For 2020, SBUA requests a step increase and COLA adjustment with the resultant rate for Mr. Chernick of \$430 per hour (400*1.05*1.0255, rounded to the nearest five, per D.13-05-009). Resolution ALJ-387 states that "It is reasonable to allow individuals an annual "step increase" of five percent, twice within each experience level and capped at the maximum rate for that level, as authorized by D.07-01-009." Mr. Chernick has not received a step increase for his experience level. In addition, Resolution ALJ-387 proposes a COLA of 2.55% for 2020.
Comment 3	Hourly Rate for Expert John D. Wilson: SBUA seeks an hourly rate for expert John Wilson of \$360 for the work he performed in 2020. SBUA made an identical request in A.19-07-006. Pending a decision on that compensation claim, the same 2020 hourly rate will apply here.
	Mr. Wilson's requested compensation "take[s] into consideration the market rates paid to persons of comparable training and experience who offer similar services," see PUC § 1806, is within the established 2020 range of rates for his level of experience, and is in accordance with Resolution ALJ-387 and the Commission's guidelines in D. 05-11-031.
	Mr. Wilson is a public policy expert with a Master of Public Policy from Harvard University, 1990, and a Bachelor of Arts in Physics from Rice University, 1992. He has worked as an expert, consultant, and analyst since 1992 – a period of over 28 years – and has exceptionally strong credentials. For 12 years, from 2007-2019, Mr. Wilson was the Deputy Director for Regulatory Policy, Southern Alliance for Clean Energy where he managed regulatory policy, including supervision of experts in areas of energy efficiency, renewable energy, and market data, provided expert witness

Attachment or Comment #	Description/Comment
	testimony on a broad range of public policy and utility matters, including rate design, resource planning, renewable energy, energy efficiency, and resource procurement, and directed litigation activities. In 2019 he joined Resource Insight, Inc. as its Research Director, where he continues working as a policy expert on a wide range of utility matters, including for SBUA in CPUC proceedings. Mr. Wilson has submitted expert testimony in numerous PUC dockets. Additionally, Mr. Wilson is the author or co-author of over 55 publications, reports, and presentations dealing with utility and energy issues.
	A copy of Mr. Wilson's professional qualifications is included herewith as <a href="https://example.com/Attachment#4"><u>Attachment#4</u></a> .
	The reasonableness of the \$360 rate is confirmed when compared to the rates the Commission has approved for other experts with comparable qualifications and experience in the energy industry and administrative proceedings. See PUC § 1806; guidelines in D.05-11-031. For example, the Commission granted an hourly rate of \$435 for work performed by A4NR's expert, Richard Wolfe, in 2018. D.18-10-050. Mr. Wolfe at the time had over 30 years of experience as an expert and consultant, id., at pp. 30-31, which is two more years than Mr. Wilson, but the requested rate for Mr. Wilson is considerably lower (\$75 less an hour) than Mr. Wolfe. The Commission granted an hourly rate of \$395 for work performed by TURN's expert, Bruce Lacy, in 2017. D.18-10-045. Mr. Lacy has approximately 34 years of experience as an expert in 2017, 6 years more experience than Mr. Wilson, but rates have increased since 2017, see D.11-03-022, p. 12 (Mr. Lacy had 28 years of experience in 2011), and Mr. Wilson is requesting a rate \$30 lower than Mr. Lacy was awarded 3 years ago in 2017. Mr. Wolfe and Mr. Lacy are apt comparisons because both are colleagues with high levels of experience in energy law and administrative proceedings, like Mr. Wilson.
	In sum, the requested 2020 hourly rates for services provided by Mr. Wilson in this proceeding are justified on the years of experience this expert has in the energy industry based on the schedule of hourly rates adopted by the Commission in Resolution ALJ-387 for experts with comparable experience. For 2020, the PUC compensated experts with 13+ yrs. of experience in the range of \$190-\$465 per hour. Resolution ALJ-387. Mr. Wilson's requested rate of \$360 is within the adopted range and justified by his 28+ years of experience and credentials and comparisons with colleagues.
Comment 4	Time on Compensation: Because SBUA has relatively few hours of work conducted in 2021 on this request for compensation and all merit work was

Attachment or Comment #	Description/Comment
	completed in calendar year 2020, SBUA is seeking compensation for time spent on this request at ½ our standard hourly rates for 2020.  SBUA plans to and reserves its right to request updated rates for 2021 in
	accordance with the market study and formulas adopted by the Commission in Resolution ALJ-393, issued on December 22, 2020, in our future requests for compensation that include work in 2021.

# D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1]	Although we verified that SBUA participated in this proceeding (i.e., response to the application and participation during the PHC), as noted by SBUA, the scope of this proceeding was eventually limited to the issue of SCE's study on residential customers with heat pump water heaters ( <i>See</i> March 19, 2020 assigned Commissioner's Scoping Memo and Ruling, and the assigned Administrative Law Judge's June 24, 2020 ruling). The total hours claimed (26.40) are excessive given SBUA's limited response and overall lack of substantial contribution on this issue. We allow a total of 10 hours, which we believe to be more reasonable and consistent with SBUA's level of participation in this proceeding.
[2]	Hours awarded for each SBUA expert by year are calculated by applying the associated percentage of total hours claimed by each attorney and expert in a given year to the total 10 hours awarded (i.e., a representative's hours in a given year are divided by the total 26.40 hours claimed; the resulting percentage is then multiplied by the total 10 hours awarded). Ms. Weberski is claiming 41% of the total hours claimed for 2019, hence total 2019 hours awarded will be 4.13.
[3]	Per D.22-01-012, Ms. Weberski's adopted rate for 2019 is \$460.
[4]	Hours awarded for each SBUA expert by year are calculated by applying the associated percentage of total hours claimed by each attorney and expert in a given year to the total 10 hours awarded (i.e., a representative's hours by in a given year are divided by the total 26.40 hours claimed; the resulting percentage is then multiplied by the total 10 hours awarded). Ms. Weberski is claiming 34% of the total hours claimed for 2020, hence total 2020 hours awarded will be 3.41.
[5]	Per D.22-01-012, Ms. Weberski's adopted rate for 2020 is \$470.
[6]	Hours awarded for each SBUA expert by year are calculated by applying the associated percentage of total hours claimed by each attorney and expert in a given year to the total 10 hours awarded (i.e., a representative's hours by in a given year are divided by the total 26.40 hours claimed; the resulting percentage is then

Item	Reason
	multiplied by the total 10 hours awarded). Mr. Chernick is claiming 6% of the total hours claimed for 2019, hence total 2019 hours awarded will be0.57.
[7]	Hours awarded for each SBUA expert by year are calculated by applying the associated percentage of total hours claimed by each attorney and expert in a given year to the total 10 hours awarded (i.e., a representative's hours by in a given year are divided by the total 26.40 hours claimed; the resulting percentage is then multiplied by the total 10 hours awarded). Mr. Chernick is claiming 8% of the total hours claimed for 2020, hence total 2020 hours awarded will be0.76.
[8]	Per D.22-03-029, Mr. Chernick's adopted rate for 2020 is \$430.
[9]	Hours awarded for each SBUA expert by year are calculated by applying the associated percentage of total hours claimed by each attorney and expert in a given year to the total 10 hours awarded (i.e., a representative's hours by in a given year are divided by the total 26.40 hours claimed; the resulting percentage is then multiplied by the total 10 hours awarded). Mr. Wilson is claiming 11% of the total hours claimed for 2020, hence total 2020 hours awarded will be 1.14.
[10]	Per D.22-03-029, Mr. Wilson's adopted rate for 2020 is \$360.
[11]	Adopted rate for 2020 is \$470. Since intervenor compensation claim preparation is compensated at ½ the preparer's normal rate, Ms. Weberski's rate will be \$235.
[12]	Per D.22-01-012, Ms. Weberski's adopted rate for 2021 is \$625. Since intervenor compensation claim preparation is compensated at ½ the preparer's normal rate, Ms. Weberski's rate will be \$312.50

# PART IV: OPPOSITIONS AND COMMENTS Within 30 days after service of this Claim, Commission Staff or any other party may file a response to the Claim (see § 1804(c))

A. Opposition: Did any party oppose the Claim?	No
B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?	No

# **FINDINGS OF FACT**

- 1. Small Business Utility Advocates has made a substantial contribution to D.20-12-032.
- 2. The requested hourly rates for Small Business Utility Advocates' representatives as adjusted herein are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.

- 3. The claimed costs and expenses as adjusted herein are reasonable and commensurate with the work performed.
- 4. The total of reasonable compensation is \$5,699.58.

#### **CONCLUSION OF LAW**

1. The Claim, with any adjustment set forth above satisfies all requirements of Pub. Util. Code §§ 1801-1812.

#### **ORDER**

- 1. Small Business Utility Advocates shall be awarded \$5,699.58.
- 2. Within 30 days of the effective date of this decision, Southern California Edison Company shall pay Small Business Utility Advocates the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning May 4, 2021, the 75<sup>th</sup> day after the filing of Small Business Utility Advocates' request, and continuing until full payment is made.
- The comment period for today's decision is not waived.This decision is effective today.Dated \_\_\_\_\_\_\_, at San Francisco, California.

#### **APPENDIX**

# **Compensation Decision Summary Information**

<b>Compensation Decision:</b>		<b>Modifies Decision?</b>	No
<b>Contribution Decision(s):</b>	D2012032		
Proceeding(s):	A1912008		
Author:	ALJ Seybert		
Payer(s):	Southern California Edison Company		

# **Intervenor Information**

		Amount	Amount		Reason Change/
Intervenor	<b>Date Claim Filed</b>	Requested	Awarded	Multiplier?	Disallowance
Small Business	2/18/21	\$12,841.50	\$5,699.58	N/A	See CPUC Comments,
Utility Advocates					Disallowances, and
					Adjustments above

# **Hourly Fee Information**

		Attorney, Expert,	Hourly	Year Hourly	Hourly
First Name	Last Name	or Advocate	Fee Requested	Fee Requested	Fee Adopted
Jennifer	Weberski	Expert	\$460	2019	\$455.00
Jennifer	Weberski	Expert	\$470	2020	\$465.00
Paul	Chernick	Expert	\$400	2019	\$400.00
Paul	Chernick	Expert	\$430	2020	\$430.00
John	Wilson	Expert	\$360	2020	\$360.00
Jennifer	Weberski	Expert	\$470	2021	\$625.00

(END OF APPENDIX)